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*Proposed Counsel to the Debtors
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Joint Administration Requested)
	:	
-----X		

**DEBTORS' MOTION FOR ENTRY OF AN ORDER EXTENDING DEADLINE
FOR DEBTORS TO FILE THEIR SCHEDULES OF ASSETS AND LIABILITIES
AND STATEMENTS OF FINANCIAL AFFAIRS**

Gawker Media LLC ("Gawker Media"), Gawker Media Group, Inc. ("GMGI"), and Kinja Kft. ("Kinja"), debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), respectfully submit this motion (the "Motion") for entry of an order, substantially in the form attached hereto as Exhibit A, granting the Debtors an extension of the time to file their (a) schedules of assets and liabilities, (b) schedules of current income and expenditures, (c) schedules of executory contracts and unexpired leases, and (d) statements of

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). The offices of Gawker Media LLC and Gawker Media Group, Inc. are located at 114 Fifth Avenue, 2d Floor, New York, NY 10011. Kinja Kft.'s offices are located at Andrássy út 66. 1062 Budapest, Hungary.

financial affairs (the “Schedules and Statements”). In support of the Motion, the Debtors hereby incorporate by reference the *Declaration of William D. Holden in Support of First Day Motions* (the “First Day Declaration”), filed concurrently herewith.² In further support of the Motion, the Debtors, by and through their undersigned proposed counsel, respectfully represent as follows:

Jurisdiction and Venue

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

2. Venue is proper in this Court pursuant to 28 U.S.C. § 1408 and 1409.

3. The statutory bases for the relief requested herein are sections 105(a) and 521 of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 1007 and 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

Procedural Background

4. On June 10, 2016, Gawker Media filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On the date hereof, GMGI and Kinja each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

5. The Debtors are operating their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. No official committee of unsecured creditors, nor any trustee or examiner, has been appointed in these cases.

7. The factual background regarding the Debtors, their business operations, their capital and debt structure, and the events leading up to the filing of these chapter 11 cases are set forth in detail in the First Day Declaration.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the First Day Declaration.

Relief Requested

8. By this Motion, the Debtors seek entry of an order extending the deadline to file their Schedules and Statements by twenty (20) days, to July 14, 2016, without prejudice to the Debtors' ability to request additional time, should it become necessary.

Basis For Relief

9. Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007 require the Debtors to file their Schedules and Statements, including their (a) schedules of assets and liabilities, (b) schedules of current income and expenditures, (c) schedules of executory contracts and unexpired leases, and (d) statements of financial affairs, within 14 days of the Petition Date. See 11 U.S.C. § 521(a); Fed. R. Bankr. P. 1007(b)(1), (c). However, the court may extend the filing deadlines as set forth in Rule 1007(b)(1), "for cause shown." Fed. R. Bankr. P. 9006(b)(1).

10. Although the Debtors have commenced the process of gathering the necessary information to prepare and finalize the Schedules and Statements, the 14-day time period provided by Bankruptcy Rule 1007 will be insufficient to complete those tasks. The Debtors' primary focus has been preparing for the filing of these chapter 11 cases. In light of the significant amount of time that must be devoted to complete the Schedules and Statements, the limited number of employees who have access to the necessary information to complete the Schedules and Statements, and the competing demands upon the Debtors' employees and professionals to commence these chapter 11 cases and stabilize the Debtors' business operations, the Debtors will not be able to complete the Schedules and Statements properly and accurately within the required 14-day time period.

11. Consequently, it is in the best interest of the Debtors to obtain a twenty-day extension of the filing deadline set forth in Bankruptcy Rule 1007, which would provide the

Debtors with a total of thirty-four (34) days from June 10, 2016, to file the Schedules and Statements. The Debtors respectfully submit that cause exists for this Court to establish July 14, 2016 as the date on or before which the Debtors must file the Schedules and Statements, without prejudice to the Debtors' right to seek a further extension from this Court.

12. In light of the foregoing, the Debtors submit that they have shown the requisite "cause" for granting the extension of time to file the Statements and Schedules, as requested by the Motion.

Notice

13. Notice of this Motion has been provided to (i) the Office of the United States Trustee for the Southern District of New York; (ii) the 50 largest unsecured creditors of the Debtors (on a consolidated basis); (iii) counsel to the First Lien Lender; (iv) counsel to the Second Lien Lender; (v) the Internal Revenue Service; and (vii) the United States Attorney for the Southern District of New York. In light of the nature of the relief requested, the Debtors submit that no other or further notice is necessary.

No Prior Request

14. No previous motion for the relief requested herein has been made to this or to any other court.

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form annexed hereto as Exhibit A, granting the relief requested in the Motion and such other and further relief for the Debtors as may be just or proper.

Dated: June 12, 2016
New York, New York

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*Proposed Counsel to the Debtors
and Debtors in Possession*

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
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Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
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Debtors.	:	(Joint Administration Requested)
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**ORDER EXTENDING DEADLINE FOR THE DEBTORS TO FILE
SCHEDULES AND STATEMENTS OF ASSETS AND LIABILITIES**

Upon the motion (the “Motion”)² of Gawker Media Group Inc. and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) for an order, pursuant to sections 105(a) and 521 of the Bankruptcy Code and Rules 1007 and 9006 of the Bankruptcy Rules, extending the deadline by which the Debtors must file their Schedules and Statements through and including July 14, 2016; and upon consideration of the First Day Declaration; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue of these chapter 11 cases and the Motion in this district is proper pursuant to 28 U.S.C. § 1408; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and it appearing that proper and adequate notice of the

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

Motion has been given and no other or further notice is necessary; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED that:

1. The Motion is granted to the extent set forth herein.
2. Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.
3. The deadline by which the Debtors must file their Schedules and Statements is extended by twenty (20) days, through and including July 14, 2016 without prejudice to the Debtors' rights to seek additional extensions.
4. This Court shall retain jurisdiction with respect to any and all matters arising from or relating to the implementation or interpretation of this Order.

Dated: June____, 2016
New York, New York

UNITED STATES BANKRUPTCY JUDGE